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April 27, 2025

VIA ELECTRONIC FILING

Hon. Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *U.S. v. Cherwitz, et al.*, No. 23-CR-146 (DG)

Dear Judge Gujarati:

On behalf of Defendants Rachel Cherwitz and Nicole Daedone, please find enclosed a proposed order to permit Paralegals Galila Assefa, Sophia Moazed, Jacob Porter, and Keith Garland, and Attorney Schuyler La Barge to bring into the courtroom their laptop computers and cellular telephones beginning May 2, 2025, when the defense is scheduled to conduct its technology check at the courthouse. The aforementioned will be assisting defense counsel during trial in the above captioned matter. Ms. Assefa and Ms. Moazed are employed by Bonjean Law Group, PLLC. Mr. Porter, Mr. Garland, and Ms. La Barge are employed by Ballard Spahr, LLC.

Respectfully submitted,

/s/JENNIFER BONJEAN

/s/ KELSEY H. KILLION

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK.

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UNITED STATES OF AMERICA,

v.

PROPOSED ORDER
23-CR-146 (DG)

RACHEL CHERWITZ and
NICOLE DAEDONE,

Defendants.

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Defendants have moved this Court for permission to permit Paralegals Galila Assefa and Sophia Moazed of Bonjean Law Group, PLLC, and Paralegals Jacob Porter and Keith Garland and Attorney Schuyler La Barge of Ballard Spahr, LLC, who will be assisting defense counsel during trial in the above captioned matter, to bring into the courtroom their laptop computers and cellular telephones beginning May 2, 2025, when the defense is scheduled to conduct its technology check at the courthouse.

This application shall be restricted to the time period beginning May 2, 2025, through jury selection before Judge Joseph A. Marutollo, and continue until the end of trial before Judge Diane Gujarati, in the above-captioned matter.

The above application is _____.

The Hon. Diane Gujarati